

## **REMARKS**

Claims 11, 22-25, and 36-44 are pending in the application. No claims are amended in the present response, however, Applicant has provided a listing of the claims for the Examiner's convenience. Reconsideration is respectfully requested in view of the following remarks.

### **I. The § 103 Rejections**

Claims 1, 22-23, 36, and 40-41 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over US 2004/0181601 to Sakthikumar ("Sakt") in view of US 2002/0124114 to Bottom et al. ("Bottom").

Claims 24-25, 37-38, and 42-43 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Sakt in view of Bottom and U.S. Patent No. 6,975,581 to Medina et al. ("Medina").

Claims 39 and 44 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Sakt in view of Bottom, Medina, and US 2003/0033517 to Rutherglen et al. ("Rutherglen").

Applicant respectfully disagrees.

Claim 1 recites a method for providing simultaneous access between a storage drive and a plurality of blade servers. In particular, the method includes configuring the plurality of blade servers to simultaneously connect with the storage drive, in which the plurality of blade servers is managed by a management system and the storage drive is coupled to the management system. The method further includes each blade server of the plurality of blade servers simultaneously routing data packets between the management system and the blade server, and the management system managing simultaneous access of the plurality of blade servers to the storage drive, including routing the data packets received from the plurality of blade servers to the storage

drive.

A potential advantage of such a method is that an increase in efficiency may be realized relative to conventional systems in which only a single blade server can access a storage drive (specification, page 2, lines 18-22).

*A. Sakt Fails To Disclose a Management System Managing Simultaneous Access of a Plurality of Blade Servers to a Storage Drive*

Referring to FIG. 1, Sakt discloses a system 10 including a routing device 20 that permits client devices 30, 35 to share a peripheral device 40 that is coupled to the routing device 20. The Examiner recognizes that Sakt fails to disclose a management system that manages simultaneous access of a plurality of blade servers to a storage drive. The Examiner, however, asserts that this limitation, absent from Sakt and recited in claim 1, is disclosed by Bottom.

*B. Bottom Fails To Disclose a Management System Managing Simultaneous Access of a Plurality of Blade Servers to a Storage Drive*

Bottom discloses a modular server system including a midplane that has a plurality of blade interfaces (see Abstract). As shown in the embodiment of FIG. 1, up to sixteen blade servers and sixteen media blades can be plugged into the midplane 170. Each media blade is adapted to carry a mass storage medium device (such as a hard drive) as a companion to a server blade (see paragraph 0035). In addition, each server blade may also have a universal serial bus (USB) connector that allows the server blade to connect to a hard drive (see paragraph [0033]).

Although Bottom discloses that a plurality of blade servers can have access to a storage device – i.e., through a USB connector or through the midplane – Bottom fails to disclose that a plurality of blade servers can simultaneously access a storage drive. As described in the background section of Applicant's specification, in a conventional blade server system, only one

blade server can connect to a storage drive at a time, and for a different blade server to connect to the storage drive, a currently connected blade server must first be disconnected (specification page 2, lines 4-7). Applicant respectfully submits that Bottom discloses such a conventional blade server system in which each blade server includes interrupt controllers 526 so that only one blade server can access a given storage device at a time.

For at least these reasons, Applicant submits that claim 1, and the claims that depend therefrom, are in condition for allowance.

*C. Other Independent Claims*

Claims 22 and 40 each incorporates limitations similar to those of claim 1. Claims 22 and 40 (and the claims that depend therefrom) are also allowable over Sakt and Bottom for reasons corresponding to those set forth with respect to claim 1.

Should any unresolved issues remain, the Examiner is invited to call the undersigned at the telephone number indicated below.

Respectfully submitted,

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